

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

DYNAENERGETICS EUROPE GMBH, and
DYNAENERGETICS US, INC.,

Plaintiffs,

v.

YELLOW JACKET OIL TOOLS, LLC,

Defendant.

Civil Action No: 6:20-cv-01110-ADA

G&H DIVERSIFIED MANUFACTURING,
LP,

Plaintiff,

v.

DYNAENERGETICS EUROPE GMBH ET
AL,

Defendants.

Civil Action No. 6:21-cv-01046-ADA

JOINT MOTION FOR CONSOLIDATION

NOW COME DynaEnergetics Europe GmbH and DynaEnergetics US, Inc. and G&H Diversified Manufacturing, LP (collectively, “the Parties”) in the above captioned cases, and file this motion for consolidation and in support would respectfully show the Court as follows:

I.

The Parties move to consolidate 6:20-cv-01110-ADA *DynaEnergetics Europe GmbH et al v. Yellow Jacket Oil Tools, LLC* (hereinafter referred to as the “-1110 Case”) and 6:21-cv-01046-ADA *G&H Diversified Manufacturing, LP v. DynaEnergetics Europe GmbH et al* (hereinafter

referred to as the “-1046 Case”) for all purposes, including through trial and any appeals, and to align the schedules in the two cases pursuant to the existing Proposed Scheduling Order, Dkt. No. 38, in the -1110 Case.

II.

Judge Edison’s Order to Consolidate Cases entered on October 7, 2021, Dkt. No. 75, in the -1046 Case demonstrates that both the Court and the Parties intend that the transfer of the -1046 Case result in consolidation of that action with the action pending before Judge Albright in *DynaEnergetics Europe GmbH et al v. Yellow Jacket Oil Tools, LLC*, No. 6:20-cv-1110 (W.D. Tex)).

WHEREFORE, the Parties, move for an order consolidating these cases for all purposes, through trial and any appeals.

Dated: October 13, 2021

Respectfully submitted,

By: /s/Eric H. Findlay

Eric H. Findlay

Texas Bar No. 00789886

Brian Craft

Texas Bar No. 04972020

FINDLAY CRAFT P.C.

102 N. College Avenue, Suite 900

Tyler, TX 75702

Telephone: (903) 534-1100

Facsimile: (903) 534-1137

Email: efindlay@findlaycraft.com

Email: bcraft@findlaycraft.com

Barry J. Herman (*pro hac vice*)

Maryland Federal Bar No. 26061

Stephanie M. Nguyen (*pro hac vice*)

DC Bar No. 1046300

Julie C. Giardina (*pro hac vice*)

Maryland Federal Bar No. 21085

WOMBLE BOND DICKINSON (US) LLP

100 Light St, 26th Floor

Baltimore, MD 21202

Telephone: (410) 545-5830

Email: Barry.Herman@wbd-us.com
Telephone: (410) 545-5873
Email: Stephanie.Nguyen@wbd-us.com
Telephone: (410) 545-5802
Email: Julie.Giardina@wbd-us.com

Preston H. Heard (*pro hac vice*)
Georgia Bar No. 476319
John G. Perry (*pro hac vice*)
Georgia Bar No. 141609
WOMBLE BOND DICKINSON (US) LLP
271 17th Street, NW, Suite 2400
Atlanta, GA 30363
Telephone: (404) 888-7366
Email: Preston.Heard@wbd-us.com
Email: John.Perry@wbd-us.com

Lisa J. Moyles (*pro hac vice*)
Connecticut State Bar No. 425652
Jason M. Rockman (*pro hac vice*)
New York Bar No. 4450953
Jason D. Radachy (*pro hac vice*)
Connecticut State Bar No. 426670
MOYLES IP, LLC
One Enterprise Drive, Suite 428
Shelton, CT 06484
Telephone: (203) 428-4420
Email: lmoyles@moylesip.com
Email: jrockman@moylesip.com
Email: jradacy@moylesip.com

***Attorneys for DynaEnergetics Europe GmbH
and DynaEnergetics US, Inc.***

/s/ Amir Alavi
Amir Alavi
State Bar No. 00793239
Demetrios Anaipakos
State Bar No. 00793258
Michael McBride
State Bar No. 24065700
Steven Jugle
State Bar No. 24083280
Joshua Wyde
State Bar No. 24060858

Louis Liao
State Bar No. 24109471
Colin Phillips
State Bar No. 24105937
Ahmad, Zavitsanos, Anaipakos, Alavi &
Mensing, P.C.
1221 McKinney Street, Suite 2500
Houston, Texas 77010
(713) 655-1101
(713) 655-0062
aalavi@azalaw.com
danaipakos@azalaw.com
mmcbride@azalaw.com
sjugle@azalaw.com
jwyde@azalaw.com
lliao@azalaw.com
cphillips@azalaw.com

***Attorneys for G&H Diversified Manufacturing,
LP***

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document *via* the Court's CM/ECF system per Local Rule CV-5(a)(3) on October 13, 2021.

/s/ Eric H. Findlay

Eric H. Findlay